

# EXHIBIT B

## Defendant's Revised Designations

William Condon – July 30, 2020											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
160	6	160	13			159	4	159	14	DOC - This testimony concerns a document that is not a trial exhibit and may not be published to the jury.	
161	9	161	11								
161	20	162	10								
162	13	162	15								
162	17	163	1								

## Defendant's Revised Designations

Timothy Cotter – February 20, 2023												
Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End	Mr. Cotter was not employed by Rearden at the time of his deposition, and will testify live at trial. On that basis, Rearden objects to all of the following designations as hearsay.			Page Start	Line Start	Page End	Line End		
10	18	10	20									
21	8	21	16									
25	12	26	1									
42	25	43	5									
62	2	62	7									
99	24	100	3									
100	4	100	7									
120	11	121	22				119	11	120			
122	1	122	4									
122	12	122	14									
122	17	123	21									
124	8	124	10									
124	13	125	7									
164	14	164	17									
164	25	165	6									
167	18	167	19	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation							
167	22	168	2	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation							
171	18	171	23	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. Relevant to Perlman's credibility.							
172	18	172	21	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. Relevant to Perlman's credibility.							
173	2	174	3	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. Relevant to Perlman's credibility.							

## Defendant's Revised Designations

174	7	174	9	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. Relevant to Perlman's credibility.							
175	10	175	16	ER 402, 403	Relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. Relevant to Perlman's credibility.							
177	4	177	25	ER 402, 403, inadmissible character evidence	This testimony is relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. It is also relevant to Perlman's credibility. This is not improper character evidence. Evidence of a witness's character "may be admitted" under FRE 608, which permits "a witness's credibility [to] be attacked...by testimony about the witness's reputation for having a character for truthfulness or untruthfulness, or by testimony in the form an opinion about that character." See Fed. R. Evid. 404(a)(3); Fed. R. Evid. 608(a). Mr. Cotter is offering such testimony here.							
178	17	178	19	ER 402, 403, inadmissible character evidence	This testimony is relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. It is also relevant to Perlman's credibility. This is not improper character evidence. Evidence of a witness's character "may be admitted" under FRE 608, which permits "a witness's credibility [to] be attacked...by testimony about the witness's reputation for having a character for truthfulness or untruthfulness, or by testimony in the form an opinion about that character." See Fed. R. Evid. 404(a)(3); Fed. R. Evid. 608(a). Mr. Cotter is offering such testimony here.							

## Defendant's Revised Designations

178	22	179	6	ER 402, 403, inadmissible character evidence	This testimony is relevant to show Perlman's motive for claiming he owned MOVA and for pursuing litigation. It is also relevant to Perlman's credibility. This is not improper character evidence. Evidence of a witness's character "may be admitted" under FRE 608, which permits "a witness's credibility [to] be attacked...by testimony about the witness's reputation for having a character for truthfulness or untruthfulness, or by testimony in the form an opinion about that character. " See Fed. R. Evid. 404(a)(3); Fed. R. Evid. 608(a). Mr. Cotter is offering such testimony here.							
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## Defendant's Revised Designations

David Feinsilber – February 28, 2020											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
7	10	7	17								
9	20	10	4								
11	14	11	15								
12	20	12	23								
14	13	14	16								
14	21	14	23								
23	25	24	19								
26	6	26	12								
26	15	26	18								
26	24	27	4								
69	10	70	2								
70	7	70	15								
88	9	88	18								

## Defendant's Revised Designations

Robin Fontaine – February 28, 2023												
Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
10	3	10	6									
16	17	16	21									
22	3	22	5									
22	6	23	6									
31	18	32	6									
35	22	36	17									
41	4	41	19									
45	3	45	21	Lack of foundation, speculation	It is not speculative or unfounded for Ms. Fontaine to explain her understanding of an email she received from Mr. Perlman.							
46	12	46	15									
48	6	48	8									
49	2	49	9									
49	22	50	1									
50	6	50	7									
50	9	50	14									
50	16	50	24									
51	1	52	2									
52	24	53	9									
53	14	53	17				53	18	54	16	Lacks foundation, speculation. Rearden's objection acknowledges the testimony lacks foundation. The Q&A that follows the designated testimony confirms the witness is speculating.	
66	17	66	25									
71	4	72	14				72	15	72	23	72:17: Attorney colloquy should not be designated.	
72	24	73	6									
77	7	77	14									
82	2	82	20									
82	25	83	22									
83	23	84	4									
84	24	85	24									
87	7	87	19				87	24	88	4		
88	5	88	21									
88	24	89	3									
89	13	90	4									
101	8	101	13									
101	20	102	5	Lack of foundation	Ms. Fontaine can testify to what she personally recalls or knows.							
102	8	102	12									
102	15	102	20									
102	22	103	1									
103	14	103	16									
103	18	103	18									

## Defendant's Revised Designations

Steve Gaub March 4, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
8	25	9	1								
10	6	10	11								
32	3	33	19			33	21	35	5	Improper counter-designation does not provide context for or relate to the designated material.	
144	18	145	24	Leading							
146	11	147	8	Leading		148	6	148	16		



## Defendant's Revised Designations

Darren Hendler – June 12, 2020											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End	Defendants represent that they may call Hendler live. Rearden objects to all designations as hearsay and improper use of deposition at trial. This objection is incorporated by this reference into all following designations.		Page Start	Line Start	Page End	Line End		
5	4	5	6								
6	11	7	2								
7	3	7	14								
7	16	8	1								
9	10	9	13			9	14	9	16		
9	17	10	3			10	4	12	9		
12	18	13	9								
14	20	17	4			14	8	14	19		
17	17	17	24								
18	2	18	8			18	9	19	16		
89	25	90	6								
90	8	90	8								
90	14	92	7								
92	12	93	2								
93	5	96	8								
96	12	98	4								
98	14	99	7								
100	4	101	21								
102	12	102	18								
110	5	111	12								
111	14	111	14								
111	16	112	4								
Darren Hendler – February 16, 2023											
133	6	133	13	Defendants represent that they may call Hendler live. Rearden objects to all designations as hearsay and improper use of deposition at trial. This objection is incorporated by this reference into all following designations.							
134	8	134	14								
134	17	134	19								
142	20	142	23								

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
				Defendants represent that they may call Hendler live. Rearden objects to all designations as hearsay and improper use of deposition at trial. This objection is incorporated by this reference into all following designations.							
149	2	149	9								
149	17	149	24			151	10	152	2	151:10-13: V, 402, 403 - The question does not define what a "similar" declaration is, and LaSalle's declaration is not similar and not in evidence.	
										151:14-17: ATT: Attorney objections and statement to witness are irrelevant and confusing.	
358	11	358	14								
358	17	359	9	Foundation, speculation							
359	15	359	17								
359	20	359	25	Foundation, speculation							
360	3	360	3	Foundation, speculation							
362	1	362	15								
368	8	368	15								
368	17	368	22								
368	24	370	13								
370	20	371	1								
372	7	373	18								
373	20	374	6								
374	16	375	8								
375	15	378	10								
379	13	381	4								
383	7	384	15								
385	4	385	8								
385	18	386	12								
390	19	392	7								
392	12	394	3								
394	11	395	5								
396	12	396	18								
396	22	397	7								
397	11	397	13								

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
				Defendants represent that they may call Hendler live. Rearden objects to all designations as hearsay and improper use of deposition at trial. This objection is incorporated by this reference into all following designations.							
397	19	397	19								
397	20	397	23								
398	2	400	2								
402	11	402	20	Leading							
402	22	403	1	Leading							
403	3	403	3	Leading							
403	5	403	7	Leading							
403	9	403	9	Leading							
403	11	403	12	Leading							
403	14	403	14	Leading							
403	16	403	18	Leading							
403	20	403	20	Leading							
403	23	404	5								
408	20	410	15								
410	20	410	22								
411	11	413	3								
421	11	421	13								
421	15	422	5								
422	16	423	3								
423	5	423	5								
423	9	423	11								
428	7	431	1								
431	2	432	7								
432	9	432	11	Leading							
432	13	433	19								
433	23	434	20								
435	9	435	12								
435	17	436	2								
437	13	437	25								
438	5	439	6								
439	10	443	18								
444	2	444	16								
445	16	450	6								
450	7	456	3								
456	11	457	1								
457	3	457	10								
457	11	457	14								
457	19	458	7								
459	6	459	24	Leading							
460	1	460	1	Leading							
460	2	460	8								
460	12	461	7								
461	11	462	8								
462	10	462	11								

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
				Defendants represent that they may call Hendler live. Rearden objects to all designations as hearsay and improper use of deposition at trial. This objection is incorporated by this reference into all following designations.							
462	13	462	19								
462	23	464	23								
465	15	466	18								
467	1	469	24	Leading							
470	1	470	1	Leading							
470	11	472	25								
474	7	475	6								
476	1	478	21								
503	11	503	17	Leading							

## Defendant's Revised Designations

Andrew Hendrickson – June 24, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
10	14	11	6								
11	23	12	8								
13	1	13	4								
15	23	16	3								
22	9	22	18								
24	6	25	7								
35	24	36	6								
36	7	36	16								
45	7	45	13								
45	14	46	11								

## Defendant's Revised Designations

Cindy levers – February 9, 2023												
Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
7	1	7	4									
10	10	10	20					10	21	11		1
15	24	16	7									
19	15	19	17									
30	20	30	22					30	23	31		19
31	20	31	25									
33	10	33	18									
83	10	84	11	FRE 402. 403	Relevant to rebut Rearden's claim that Disney should have investigated the legal rights held by a vendor.							
86	19	86	24					87	20	88		11
88	13	89	11									
96	10	96	19									
99	3	99	15									
100	1	100	3									
100	6	100	6									
100	8	100	10									
100	13	100	14									
101	5	101	25									
102	3	102	4									
102	6	102	9									
102	12	102	12									
102	14	102	17									
102	20	102	20									
103	1	103	9									
105	5	105	8					103	18	105		4
105	15	105	17									
105	19	105	25	Calls for legal conclusion	Shows the understanding of Rearden and its CFO about its legal rights which is not a legal conclusion.							
106	3	106	3	Calls for legal conclusion	Shows the understanding of Rearden and its CFO about its legal rights which is not a legal conclusion.							
106	5	106	11	Calls for legal conclusion	Shows the understanding of Rearden and its CFO about its legal rights which is not a legal conclusion.							

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
106	14	106	15	Calls for legal conclusion	Shows the understanding of Rearden and its CFO about its legal rights which is not a legal conclusion.							
108	21	108	23	Calls for legal conclusion	Shows the understanding of Rearden and its CFO about its legal rights which is not a legal conclusion.							
109	1	109	2	Calls for legal conclusion	Shows the understanding of Rearden and its CFO about its legal rights which is not a legal conclusion.							
109	4	109	7									
109	24	110	2									
110	8	110	9									
111	18	111	25									
126	11	126	15									
126	18	127	9									
127	21	128	8									
128	15	128	20									
128	25	129	6									
129	9	129	20									
133	6	133	22									
139	5	139	11									
145	23	145	25				146	1	147	3		

## Defendant's Revised Designations

Greg LaSalle – June 16, 2020													
Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling	
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End			
9	7	9	10										
10	6	10	19										
13	8	14	2				14	23	15	8			
105	23	106	16										
160	3	160	5										
160	8	160	22										
Greg LaSalle – February 14, 2023													
34	1	34	8				34	9	34	11			
34	12	34	20										
34	21	34	24										
35	5	35	6				35	12	37	23			
35	9	35	11										
39	19	40	1										
40	6	40	9										
40	12	40	17				40	19	41	5			
53	5	53	8				48	25	51	17			
53	12	53	16				55	2	59	18			
60	25	61	11				61	12	67	21	61:15-16: 402. 403: attorney colloquy/objections should be removed.		
											61:23: 402. 403: attorney colloquy/objections should be removed.		
											62:24: 402. 403: attorney colloquy/objections should be removed.		
											64:1: 402. 403: attorney colloquy/objections should be removed.		
											64:15: 402. 403: attorney colloquy/objections should be removed.		
											64:21: 402. 403: attorney colloquy/objections should be removed.		
											65:5-6: 402. 403: attorney colloquy/objections should be removed.		
											66:2-5: 402, 403: This is attorney commentary, not evidence.		
											66:6-9: 402. 403: attorney colloquy/objections should be removed.		
											66:22-23: 402. 403: attorney colloquy/objections should be removed.		
											67:7-8: 402. 403: attorney colloquy/objections should be removed.		



## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
											67:12-21: 402, 403, F: the question "we don't have it" is again attorney statement, not evidence". The designation also includes attorney objections which should be removed.	
79	25	80	2									
80	17	81	5									
81	6	81	23									
83	16	83	17									
83	19	84	8									
85	2	85	6									
85	12	85	15									
85	18	86	13									
86	15	86	21									
86	25	87	8									
93	20	93	25				93	17	93	19		
94	3	94	4				94	6	94	14	94:9-11: 402., 403: attorney colloquy/objections should be removed.	
94	21	95	4									
120	15	121	1									
121	5	121	13									
121	24	122	6									
122	7	122	21									
123	3	123	20									
126	8	127	10				170	3	171	3		
							173	22	175	23		
							176	7	176	21		
							177	5	177	11		
							177	16	178	2		
127	17	127	22									
128	5	128	9									
140	25	141	10	Lack of foundation	Mr. LaSalle can testify from personal knowledge about who he had contact with at Disney. The objection that this testimony lacks foundation is frivolous.							
149	23	152	16	Lack of Foundation	149:23-150:18: Mr. LaSalle can testify as to his personal understanding of Mr. Hendrickson's position. That he cannot offer the testimony with 100% certainty does not mean he lacks foundation for it.							
					150:19-151:1: In context, Mr. LaSalle is testifying to his understanding about an email he received. This is sufficient foundation that he has personal knowledge of the matter under FRE 602.							

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
					151:1-15: Mr. LaSalle is testifying from his personal knowledge about whether he was in the final stages of acquiring the MOVA assets. This is sufficient foundation under FRE 602.							
					151:16-152:10: Mr. LaSalle is testifying from his personal knowledge about whether there was a further discussion with Mr. Hendrickson following this email. This is sufficient foundation under FRE 602.							
					152:11-16: Mr. LaSalle personally received this phone invitation. This is sufficient foundation under FRE 602.							
152	18	153	4									
154	10	155	11									
167	21	168	16									
168	20	169	2									
169	5	170	2									
Greg LaSalle (DD3 30(b)(6)) – February 14, 2023												
9	15	9	18									
9	22	10	1									
17	7	17	14									
17	16	18	9									
18	13	18	17									
20	15	20	17									
20	19	20	19									
20	21	20	24									
Greg LaSalle SHST Trial Testimony – December 5, 2016												
38	12	38	15									
41	19	42	11									
42	14	43	12	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
44	7	44	14	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives in pursuing litigation. Admitted without objection in SHST trial.							

## Defendant's Revised Designations

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Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
45	7	45	24	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
46	17	46	19	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
46	22	47	5	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
47	21	47	23	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
48	3	48	14	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							

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Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
49	4	49	13	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.		49	14	49	24		
50	6	50	17	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
50	20	50	21	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
53	20	54	8									
54	14	55	23	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Relevant background about LaSalle's employment history with Rearden. Admitted without objection in SHST trial.							
56	18	56	23	FRE 402, 403	Relevant to show why Perlman covered LaSalle's salary and helped him acquire MOVA for LaSalle's benefit. Rebuts Perlman's testimony that he was acting purely in Rearden's business interest. Explains Perlman's motives. Admitted without objection in SHST trial.							
57	17	57	20				57	21	58	10		
58	11	58	13									
58	20	58	23									
59	7	60	4				60	5	60	10		

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
61	7	61	8				61	9	61	10		
61	11	61	17									
62	16	62	22				62	23	62	25		
64	16	65	3									
65	13	65	21				65	24	66	1		
66	2	66	7									
66	20	67	11									
67	17	68	2				68	3	68	6		
68	16	68	18				68	19	69	6		
69	9	69	22				69	23	70	23		
							71	19	73	24		
74	18	75	1				75	2	75	5		
76	8	77	2				77	3	77	8		
82	25	86	12	Foundation, speculation, hearsay, leading	Undifferentiated objections. Rearden's undifferentiated objections to this block of testimony are unclear and should be rejected on that basis. No lack of foundation/speculation: Mr. LaSalle was asked about his personal knowledge of whether motion capture work was occurring at Rearden, and what he personally knew, heard, or did related to DIDO and Perlman's plans for MOVA, so the testimony has adequate foundation under FRE 602. Not hearsay: Mr. LaSalle's statements about what Mr. Perlman told him reflect statements of a party opponent that are not hearsay. FRE 801(d)(2). Not leading. The questions are not leading, and no objection to the							
86	15	86	21									
86	25	87	2									
88	6	89	11									
89	19	91	12									
91	23	92	13				92	14	92	15		
92	16	93	3									
93	8	94	6									
94	15	94	19				94	29	95	9		
96	6	96	13									
98	15	98	24									
99	4	100	3									
100	11	100	14									
100	21	101	14				101	15	101	16		
101	17	102	4									
102	12	103	4				13	11	103	18		
103	19	103	25									
104	7	104	22				106	8	108	9		
110	2	110	8				109	15	110	1		
110	11	110	12				111	2	112	7		
113	12	113	14				113	15	113	19		
113	20	114	1									
114	13	115	1									
116	22	117	17									
117	24	118	12				118	13	118	15		
118	16	118	23									
119	16	120	7				120	14	121	1		
123	14	123	22				122	22	123	7		
124	20	124	25				124	11	124	16		
125	3	125	5									
125	17	125	25									
126	13	126	15									

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
128	6	128	21				128	22	129	14		
130	7	130	13									
137	3	137	15									
140	6	141	16									
141	19	143	8									
147	9	148	7									
151	22	152	13				150	10	151	14		
152	22	153	5	Hearsay	Not offered for a hearsay purpose but to show effect on listener; additionally, testimony about what Ms. levers and Mr. Perlman said are statements of a party opponent that may be offered for the truth. FRE 801(d)(2). This testimony was admitted without objection in the SHST trial.							
153	8	153	17	Hearsay	Not offered for a hearsay purpose but to show effect on listener; additionally, testimony about what Ms. levers and Mr. Perlman said are statements of a party opponent that may be offered for the truth. FRE 801(d)(2). This testimony was admitted without objection in the SHST trial.		153	18	153	21		
153	23	154	8	Hearsay	Not offered for a hearsay purpose but to show effect on listener; additionally, testimony about what Ms. levers and Mr. Perlman said are statements of a party opponent that may be offered for the truth. FRE 801(d)(2). This testimony was admitted without objection in the SHST trial.							
154	12	155	9									
156	5	156	10									
157	3	158	20				158	23	159	14		
							161	21	162	3		
							162	20	163	13		
165	6	166	5				166	6	166	21		
166	22	167	2				167	10	170	15		
172	2	172	4									
172	20	173	12									
176	10	176	20									
181	15	181	21									
187	9	187	22									
188	4	188	6									
188	9	188	12									
188	19	189	2									
189	9	189	15				189	16	189	19		
189	20	189	22									
192	21	193	5									
193	10	193	12									
193	16	193	22									
195	4	195	8									
Greg LaSalle SHST Trial Testimony December 6, 2016												
							192	21	193	22		

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
							194	20	195	8		
							198	23	199	25		
							200	11	201	5		
							201	25	203	13		
							204	4	204	18		
							204	25	205	15		
							206	3	207	2		
							207	22	208	2		
							208	9	209	4		
236	21	237	23									
							237	24	238	4		
							238	11	239	5		
							240	23	241	2		
							241	14	242	15		
							243	11	243	17		
							244	2	244	16		
							245	22	246	18		
							247	24	248	14		
							248	21	248	24		
							251	24	252	10		
							253	2	253	22		
							253	23	256	11		
							256	24	257	8		
							257	18	258	15		

## Defendant's Revised Designations

Gary Lauder (SHST Trial Testimony) – December 12, 2016											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
394	13	394	15								
395	15	395	18								
395	22	395	24								
396	2	396	14								
396	25	398	23								
400	13	401	25								
402	18	403	7								
403	16	404	2								
404	11	405	6			405	7	405	11		
405	12	405	17			405	18	405	23		
405	24	406	9								
406	13	406	20								
406	23	406	24								
407	2	407	4								
407	7	408	10								
409	12	410	20								
411	3	411	20			412	15	413	4		
413	12	414	4								
Gary Lauder – February 13, 2023											
8	14	8	19								
8	25	9	4								
14	24	15	16								
18	11	19	18								
25	12	25	16								
31	9	31	21								
33	24	34	5								
34	12	34	14								
52	22	53	5								
57	23	58	10								
60	5	61	1			61	2	61	10		
61	2	61	5								
61	7	62	3								
62	5	62	9								
63	12	63	20								
64	20	66	11								
68	6	69	9								
69	14	70	4								
70	6	70	17								
72	6	72	18								
73	4	73	6								
73	8	73	9								
73	15	73	16								
74	1	74	5								
75	8	75	22								
80	5	80	14								
80	16	80	23								
80	25	81	1								
93	9	93	15								
95	17	96	16								
96	20	96	23								
97	4	97	7								
99	3	100	24								
104	4	104	9								
104	21	105	11								
105	18	107	1								
107	9	108	2								
108	6	108	18								
110	19	111	4								



**Defendant's Revised Designations**

111	9	111	12								
111	19	112	4								
112	17	114	21								
116	15	116	16								
116	23	117	2								
117	23	118	13								
119	2	119	6								
119	8	121	13								
121	15	121	15								
130	2	130	8								
130	14	131	17								
132	18	133	1								
133	7	133	11								
133	13	133	25								
134	2	134	2								
135	24	136	9								
136	15	136	15								
136	16	136	19								
137	5	137	22								
141	7	141	8								
144	11	145	10								
145	17	146	1								
146	5	146	16								
147	12	147	15								
147	24	148	4								
152	24	154	2								
155	13	155	20								
157	7	157	25								

## Defendant's Revised Designations

Kevin Mayer – February 10, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
9	7	9	13								
9	19	9	22								
16	17	17	4								
17	23	18	1								
18	2	18	17								
26	21	27	10								
32	16	33	2								
39	5	39	9								
40	23	41	21								
50	21	51	8								
51	16	51	24			52	7	54	1		
54	3	54	5								
54	7	54	8								
59	16	59	20								
62	5	62	20			62	21	63	5		
63	18	64	14								
76	6	76	11								
77	9	77	25								
78	13	79	8								
79	9	79	16			79	17	80	12		
80	13	81	10								
86	3	87	10								
87	17	87	20								
87	22	89	4								
90	21	91	3								
91	7	92	3								
92	5	92	6								
93	3	94	8								
97	19	99	9								
99	18	100	4								
100	9	100	17								
100	21	100	23								
102	7	102	19								
102	25	103	2								
103	9	103	23								

## Defendant's Revised Designations

Alberto Menache – June 22, 2023												
Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End	Mr. Menache is not an officer, director, managing agent or designee of Rearden, and will testify live at trial. On that basis, Rearden objects to all of the following designations as hearsay.			Page Start	Line Start	Page End	Line End		
9	21	9	24									
19	14	19	18									
19	23	20	1									
25	9	27	9									
34	10	36	25									
38	13	38	16									
38	19	38	19									
38	22	40	5									
42	12	42	16	Lacks foundation, speculation	Mr. Menache has foundation to say whether or not he is disputing on of the conclusions reached by Dr. Lane. Additionally, his testimony that it is "certainly possible" that it took 169,000 hours of non-MOVA time to create the Beast is well-founded in Mr. Menache's years of experience working with CG character animation pipelines.							
42	19	42	25									
48	10	48	15									
48	20	50	17									
50	20	52	17									
53	15	54	5									
54	12	55	24	Lacks foundation, speculation	54:12-15: Mr. Menache has foundation to explain what his expert opinions do and do not cover.							
					54:16-17: Mr. Menache is an expert in facial motion capture and offers opinions on MOVA's capabilities. He absolutely has foundation to testify about what MOVA software code does and does not do.							
					55:18-24: Mr. Menache is an expert in CG chracter animation and has foundation to testify as to whether it would be consistent with common practice to use many other types of software to create the Beast.							
56	2	57	8	Lacks foundation, speculation	56:2-20: Mr. Menache is an expert in CG character animation and has foundation to testify as to whether it would be consistent with common practice to use many other types of software to create the Beast.							
					56:21-57:8: Mr. Menache is an expert in CG cahracter animation and has foundation to testify as to steps typically taken in the animation pipeline and whether those steps would use MOVA.							
57	22	58	15									
67	25	72	14									

## Defendant's Revised Designations

91	10	91	14				91	15	91	20		
91	21	92	3									
155	2	155	25									
170	15	170	21				170	22	171	5		
202	23	203	1				203	2	203	11		
207	6	207	24									
207	25	207	25									
208	10	208	11									
208	17	210	2				210	8	211	12		
211	13	212	3									
212	11	214	3				214	4	214	22	Speculation, lack of foundation, 702, SCRIPTS, outside the scope of the expert report. Menache's claim that FACS blendshapes created by MOVA were used in the facial model for the Beast for hand animation is excluded by the SCRIPTS ruling, lacks foundation, and expresses opinions outside the scope of Menache's expert reports. Menache did not offer an opinion in any of his reports as to whether blendshapes were used to animate the Beast, and had no foundation to do so because he did not review documents or testimony about how the Beast was created. Additionally, a FACS blendshape is created using a Maya script and the Court has excluded scripts. See Menache Depo Tr. at 45:6-11, 153:10-13, 153:22-154:16, 190:16-19, 214:23-215:5 (confirming a Maya script is what creates the blendshape from a FACS (facial expressions) captured by MOVA); Id. at 200:18-201:15 (admitting he did not describe MOVA's use for blendshapes in his opening report); Id. at 345:6-9 (admitting he did not discussed how Maya scripts were used in BATB in his rebuttal report); Id. at 223:23-25, 224:5-7, 227:3-14 (admitting he does not know how DD3 built the facial model of the Beast that he claims would have included FACS blendshapes creates by Maya scripts).	
217	5	217	9									
217	15	217	23				217	24	218	1		
218	2	218	9									
218	16	220	18									
221	17	221	24									
222	22	223	18				223	19	223	22	Speculation, lack of foundation, 702, SCRIPTS, outside the scope of the expert report. Menache's claim that FACS blendshapes created by MOVA were used in the facial model for the Beast for hand animation is excluded by the SCRIPTS ruling, lacks foundation, and expresses opinions outside the scope of Menache's expert reports. Menache did not offer an opinion in any of his reports as to whether blendshapes were used to animate the Beast, and had no foundation to do so because he did not review documents or testimony about how the Beast was created. Additionally, a FACS blendshape is created using a Maya script and the Court has excluded scripts. See Menache Depo Tr. at 45:6-11, 153:10-13, 153:22-154:16, 190:16-19, 214:23-215:5 (confirming a Maya script is what creates the blendshape from a FACS (facial expressions) captured by MOVA); Id. at 200:18-201:15 (admitting he did not describe MOVA's use for blendshapes in his opening report); Id. at 345:6-9 (admitting he did not discussed how Maya scripts were used in BATB in his rebuttal report); Id. at 223:23-25, 224:5-7, 227:3-14 (admitting he does not know how DD3 built the facial model of the Beast that he claims would have included FACS blendshapes creates by Maya scripts).	
228	13	228	24									
242	25	243	14									
244	10	244	15									
244	25	245	22				245	23	246	15		
246	16	246	23				246	24	247	7		
253	6	254	5				254	6	254	14		
254	15	254	20									
265	7	265	18									

## Defendant's Revised Designations

Gayle Munro – March 10, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
16	16	16	24								
16	25	17	2								
18	12	18	25								
160	1	160	3								
160	6	160	7								
190	11	190	24								
191	17	193	13								
237	19	238	2								
238	4	238	11								
238	14	238	17								
238	19	238	21								

**Defendant's Revised Designations**

Ken Pearce – March 6, 2020											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
6	11	6	14								
16	9	17	4								
152	4	152	5								
152	8	152	16								
168	18	168	22								
168	24	169	2								
169	25	170	5								
170	7	171	4								
171	6	171	7								

## Defendant's Revised Designations

Steve Perlman – March 6, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
10	3	10	14								
10	19	10	23								
11	8	11	20			11	21	11	23		
12	6	12	9								
13	6	13	21			13	22	13	24		
13	25	15	6								
15	17	16	1								
20	21	21	20								
22	11	22	19								
24	7	24	13								
24	16	25	1			25	23	28	21		
26	15	26	18								
28	12	28	15								
28	22	28	25								
30	8	30	21								
32	21	33	8								
42	2	42	12								
45	10	46	2								
47	16	48	1								
48	6	48	8								
48	11	49	25								
50	2	50	16								
51	23	52	3								
53	15	53	19								
54	8	55	11								
57	15	57	19								
64	19	65	7			65	8	65	25		
76	15	77	10								
82	6	82	9								
83	19	84	13								
84	20	85	3			85	4	85	7		
85	8	85	24			85	25	86	4		
86	5	86	9			86	10	87	14		
88	18	88	22								
89	5	89	25								
91	6	91	11								
91	16	91	21			91	22	92	25		
93	1	93	24								
95	19	97	2			97	3	97	13		
97	16	97	20								
97	23	98	4								
98	11	99	8			99	9	100	8		
109	11	109	14								
110	2	111	3			111	4	112	12		
112	13	113	11								
115	13	116	10			116	11	116	25		
117	1	117	5			117	6	117	11		
117	12	118	2			118	3	120	16		
120	17	120	20								
120	22	121	13			121	14	121	16		
123	19	124	4								
125	3	125	16								
127	11	127	14								
128	22	129	9								
131	15	131	24								
135	18	136	11								
136	15	137	1								
137	10	137	20								

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
138	12	138	20								
143	14	144	24			144	25	145	4		
145	5	145	8								
156	5	156	12			156	13	157	7		
157	17	158	5								
158	11	159	5			161	6	162	17		
159	22	161	5								
163	20	164	24								
170	7	170	22								
171	10	172	16								
173	23	174	14								
174	22	175	8								
175	11	176	5								
177	12	177	23								
178	4	178	7			178	8	181	18		
						182	24	184	20		
185	7	187	22			187	23	189	2		
189	3	189	5								
189	8	189	22								
198	23	199	18								
201	13	201	18								
202	17	203	2								
214	6	214	11								
223	23	224	13								
226	18	227	3								
227	7	228	5								
246	19	247	10			247	11	248	8		
257	11	257	16								
257	23	258	8								
258	16	259	19								
267	12	269	8								
269	11	269	16								
269	18	270	19								
270	25	272	4								
272	7	272	8								
273	11	273	19								
274	24	277	16								
278	6	278	10								
299	6	299	17								
299	21	300	11			300	12	301	18		
301	19	301	22								
302	6	302	8								
320	5	320	8								
320	15	321	11								
322	25	323	13								
323	24	324	7								
324	9	324	18								
325	17	326	6								
326	11	327	5								
327	8	328	5			328	6	328	22		
328	23	329	12			329	13	330	12		
333	5	333	12			333	13	333	24		
333	25	334	16								
335	10	335	18			335	19	336	16		
341	2	341	8								
342	16	342	25								
343	22	344	2								
344	14	344	17								
345	12	345	16			345	17	345	20		



## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
347	24	349	3			349	4	350	21		
350	22	351	22								
352	18	352	19			352	7	352	17		
352	23	352	23								
353	1	353	25								
354	3	355	14								
359	4	359	19			359	20	360	23	360:3-4: SCRIPTS: Testimony about Rearden allegedly developing retargeting software in Maya precluded by Maya Scripts Order (Dkt. 480).	
360	24	361	12			361	13	363	23		
						364	13	366	7		
						367	4	371	22		
372	18	373	12			373	13	373	14		
375	12	376	11			376	12	377	5		
377	6	378	16								
378	23	379	14			379	15	379	22	379:15-19: MIL 1, 403: This testimony discusses the Special Master return process in the SHST v. Rearden matter. The order to DD3 to return MOVA assets, the appointment of a Special Master, and the process of DD3 returning files are not relevant but are prejudicial to Defendant and confusing to the jury.	
379	23	381	4			381	5	381	11		
381	12	381	15			381	16	381	24		
381	25	382	14								
397	19	398	10			397	3	397	18		
398	24	399	13								

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
406	8	406	21			405	9	406	7	MIL 7: Testimony regarding the copyright notice allegedly affixed in the first frame of MOVA output files is not relevant, since there is no evidence Defendant ever saw such a notice, and should be excluded for reasons set forth in Defendant's motion in limine No. 7.	
407	7	407	12								
407	18	408	11			408	12	410	7	MIL 1, 403: The testimony refers to the asset-return process, which is irrelevant, prejudicial, and involves court orders in the SHST litigation. In addition, Mr. Perlman mentions Judge Tigar by name, which is prejudicial to Defendant.  MIL 7: Testimony regarding the copyright notice allegedly affixed in the first frame of MOVA output files is not relevant, since there is no evidence Defendant ever saw such a notice, and should be	
410	8	410	13			410	14	410	17		

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
411	5	411	11			411	12	413	13	MIL 7: Testimony regarding the copyright notice allegedly affixed in the first frame of MOVA output files is not relevant, since there is no evidence Defendant ever saw such a notice, and should be excluded for reasons set forth in Defendant's motion in limine No. 7.	
413	14	413	17								
424	8	424	8								
424	13	424	17								
425	8	427	6								
427	9	428	15								
428	19	429	4								
434	22	434	25								
441	14	442	13								
443	5	444	3								
444	7	447	1			447	2	447	17		
447	20	451	12								
452	3	453	10			453	11	454	11		
454	12	454	15								
454	22	457	15								
457	18	458	18			458	19	458	24		
459	1	460	2			460	3	463	23	462:17: ATT: Attorney objection should be excluded.	
464	1	464	12								
464	15	464	15								
466	2	466	22								
467	11	467	15								
468	2	469	2								
469	5	470	15			470	16	471	16		
474	3	474	16								
474	18	474	22								
474	24	475	5								
498	1	499	8								
499	13	499	22								
499	25	500	6								
500	10	500	19								
502	13	502	15								
502	19	503	5								
503	7	503	17								
503	20	503	24								
503	20	503	24								

**Defendant's Revised Designations**

Kelly Port – February 5, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
9	14	9	23								
12	3	12	21								
15	10	15	20								
78	17	80	4								
87	13	94	25								

## Defendant's Revised Designations

Dan Stevens – February 7, 2023												
Defendant's Designations				Plaintiffs' Objections	Defendant's Confidentiality Designation	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
6	8	6	16									
9	1	9	2		Confidential							
9	7	9	12		Confidential							
12	18	13	7		Confidential							
16	19	17	2		Confidential							
34	4	36	4									
46	6	49	14									
53	12	53	19									

## Defendant's Revised Designations

Mimi Steele – March 11, 2020												
Defendant's Designations				Plaintiffs' Objections	Defendant's Confidentiality Designation	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
7	10	7	14				7	17	7	20		
8	10	8	18				8	19	9	14	8:20: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
											9:5-6: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
10	2	10	8									
10	12	10	24									
10	25	11	18									
11	20	11	24									
12	3	12	23				12	24	13	8	13:3-4: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
13	12	13	13									
13	19	14	10									
15	6	15	21									
16	8	16	23									
17	2	18	7									
18	17	19	6									
23	15	24	12									
24	15	25	14				25	19	27	4	25:22: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Confidentiality Designation	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
											27:2: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
27	5	27	10				27	11	27	20	27:14-15: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
27	21	27	24				27	25	28	21		
91	7	92	2									
92	4	92	6									
92	8	93	9				96	5	96	10		
120	12	121	2				121	23	122	13		
124	4	124	20									
125	3	125	20				127	8	129	24	128:17: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
											129:7-8: S, 701 - Calls for speculation, opinion testimony	
											129:9: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
Mimi Steele – February 13, 2023												

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Confidentiality Designation	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
7	12	7	22				10	24	11	15	DOC - This testimony concerns a document (displayed on screen in the deposition video) that is not a trial exhibit and may not be published to the jury	
17	4	17	5									
17	25	18	8				18	14	18	20		
							18	22	19	12	402, 403: Evidence of post-injunction conduct is irrelevant in light of the Court's summary judgment ruling that Defendant is not liable for any post-injunction conduct	
											19:1: ATT, 402, 403 - Attorney objections are not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
19	18	21	1				21	2	21	2		
22	13	23	11				22	1	22	12		
							23	12	23	19	402, 403: Evidence of post-injunction conduct is irrelevant in light of the Court's summary judgment ruling that Defendant is not liable for any post-injunction conduct	
											23:15: ATT, 402, 403 - Attorney colloquy is not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	



## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Confidentiality Designation	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
24	4	25	1				25	2	26	15	402, 403: Evidence of post-injunction conduct is irrelevant in light of the Court's summary judgment ruling that Defendant is not liable for any post-injunction conduct	
											25:20: ATT, 402, 403 - Attorney colloquy is not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
											25:22-26:1: ATT, 402, 403 - Attorney colloquy is not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
											26:14: ATT, 402, 403 - Attorney colloquy is not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
							27	7	28	23	27:20-21: ATT, 402, 403 - Attorney colloquy is not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Confidentiality Designation	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
											27:24-28:1: ATT, 402, 403 - Attorney colloquy is not relevant and may cause the jury to draw improper and prejudicial inferences. All objections and colloquy should be omitted	
47	13	47	17									
47	20	47	23									
47	25	48	9									
48	11	48	11									
64	13	67	9									
67	10	67	21		Confidential							
68	17	70	11		Confidential							
70	12	73	6									
73	9	74	5									
80	13	81	23									
81	25	81	25									
83	21	83	22									
83	24	83	24									
84	1	84	2									
84	4	84	4									
84	19	85	13									
86	14	86	18				86	19	87	10		

## Defendant's Revised Designations

Angela Tinwell – December 11, 2020												
Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
10	6	10	12									
15	2	15	12				15	13	16	11		
							17	24	18	12		
							18	20	18	22		
							28	14	29	1		
							56	24	57	2		
							71	19	72	7		
							74	15	74	21		
							77	5	77	10		
83	15	83	21									
91	6	91	11									
91	24	92	9	Calls for speculation	Ms. Tinwell is not speculating about what she personally sees the Beast communicating non-verbally. She is a purported expert on how CG characters convey human expression and is applying that expertise to what she personally sees in this scene.							
92	16	94	16	Lacks foundation, calls for speculation	92:16-93:20: Ms. Tinwell is not speculating about what she personally sees the Beast communicating non-verbally. She is a purported expert on how CG characters convey human expression and is applying that expertise to what she personally sees in this scene.		94	17	94	18		
					93:21-94:16: Ms. Tinwell has foundation to answer the question about whether or not she personally knows if MOVA was responsible for the qualities she is perceiving in this shot. Additionally, the Court has already ruled that Ms. Tinwell has foundation to opine as to whether MOVA enabled a human-like presentation of the Beast. Dkt. 295 at 9. Having advocated for and obtained this result, Rearden is judicially estopped from asserting otherwise. Hamilton v. State Farm Fire & Cas. Co., 270 F.3d 778, 782-783 (9th Cir. 2001).							

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
102	24	104	25	Calls for speculation	Ms. Tinwell has foundation to answer the question about whether or not she can tell from looking at this clip if MOVA was used to create the Beast's face. Additionally, the Court has already ruled that Ms. Tinwell has foundation to opine as to whether MOVA enabled a human-like presentation of the Beast. Dkt. 295 at 9. Having advocated for and obtained this result, Rearden is judicially estopped from asserting otherwise. <i>Hamilton v. State Farm Fire &amp; Cas. Co.</i> , 270 F.3d 778, 782-783 (9th Cir. 2001).		106	14	107	18	108, 403. The designation at 106:14-107:18 is incomprehensible and incomplete without this testimony and the playing of the video clip about which Dr. Tinwell offers the testimony.	
											106:14-17: 108, 403. This designation is incomprehensible and incomplete without the playing of the video clip about which Dr. Tinwell offers the testimony. If Rearden offers this testimony, it should be required to play the video clip for juror comprehension and completeness.	
107	19	107	25									
108	19	111	9				111	10	112	15	Foundation, speculation, 702 (b), SCRIPTS. Dr. Tinwell admits in the Q&A that follows that she does not know how this shot was created. She is speculating FACS were used. She has no factual basis for that testimony and therefore cannot offer it under 702 (b) (an expert witness may testify in the form of an opinion only if "the testimony is based on sufficient facts or data"). Additionally blendshapes from FACS are created with a Maya Script, and the Court has excluded Maya Scripts from evidence.	

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
112	16	112	25									
145	1	145	9									
149	7	150	7									
258	13	258	25									
260	1	260	6									
262	10	262	23									
263	24	264	2	Lacks foundation, calls for speculation	There is no requirement that an expert must have seen a document relevant to their field of study before they may be cross-examined about that document.		263	1	263	23	402, 403. Attorney colloquy should be removed.	
264	10	266	15	Hearsay	264:10-266:2: The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant. Additionally, the question to Ms. Tinwell is not about whether the statement in the document is true, but whether the document is describing the uncanny valley phenomenon.							
					266:3-5: Ms. Tinwell's admission that the uncanny valley phenomenon can occur even when MOVA is used is not hearsay.							
					266:6-15: This is not hearsay. These questions and answers relate to what Ms. Tinwell knows and understands, not the truth of what the article is saying.							
266	23	266	25									
267	5	268	4	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant. Additionally the document is being used to impeach Ms. Tinwell's claim that the articles' criticisms were limited to the younger Brad Pitt.							
270	19	271	13									
272	14	272	17				272	18	273	10		
275	1	275	3									
275	7	276	9									
277	2	277	8									
279	9	280	18	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant.							

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
280	21	280	24									
281	6	281	17	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant. Additionally, the question to Ms. Tinwell is not about whether the statement in the document is true, but whether the document is describing the uncanny valley phenomenon.							
282	13	282	21	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant.							
283	1	283	5									
283	11	283	19	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant.							
284	6	285	12	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant. Additionally, the question to Ms. Tinwell is not about whether the statement in the document is true, but whether the document is describing the uncanny valley phenomenon.							
285	14	290	3	Hearsay	285:14-288:9: The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant.							

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
					288:10-289:16: The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant. Additionally, the question about the document here is being used for impeachment to show Ms. Tinwell is not credible in asserting that the review of the Beast was not that bad.							
					289:17-290:3: This question and answer does not refer to any out of court statement and therefore is not objectionable as hearsay.							
290	4	290	9									
290	16	291	18	Hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant.		291	19	292	22	402, 403: Attorney colloquy should be removed.	
294	24	295	4	FRE 402, 403	This is relevant, foundational testimony for the questioning that follows, which shows that there were critical reviews of the main character despite MOVA's use for that character. Having touted MOVA's use in Tron in its operative complaint, see Second Amended Complaint ¶¶ 38, 58, 60, Rearden cannot claim this evidence is irrelevant.							
296	20	297	22	FRE 402, 403, hearsay	296:20-23: This is not hearsay. Having touted MOVA's use in Tron in its operative complaint, see Second Amended Complaint ¶¶ 38, 58, 60, Rearden cannot claim this evidence is irrelevant.							

## Defendant's Revised Designations

Defendant's Designations				Plaintiffs' Objections	Defendant's Response	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End				Page Start	Line Start	Page End	Line End		
					296:24-297:22: The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant.  Having touted MOVA's use in Tron in its operative complaint, see Second Amended Complaint ¶¶ 38, 58, 60, Rearden cannot claim this evidence is irrelevant.							
298	2	298	9	FRE 402, 403, hearsay	The document is not being used for its truth, but to show how critics reacted to characters created with MOVA. Whether that criticism was true is irrelevant. Having touted MOVA's use in Tron in its operative complaint, see Second Amended Complaint ¶¶ 38, 58, 60, Rearden cannot claim this evidence is irrelevant.							
308	19	308	23									
309	1	309	5	Speculation	This is appropriate cross examination to show that Dr. Tinwell has no basis to claim that MOVA drew audiences to see the movie.							
313	23	316	1									
316	21	316	24									



## Defendant's Revised Designations

Roger Van der Laan – February 23, 2023											
Defendant's Designations				Plaintiffs' Objections	Ruling	Plaintiffs' Counter-Designations				Defendant's Objections	Ruling
Page Start	Line Start	Page End	Line End			Page Start	Line Start	Page End	Line End		
11	3	11	5								
15	19	15	22								
15	24	16	10								
122	21	122	23								
123	1	123	3								
139	7	139	9								
140	6	140	8								
141	12	141	17								
141	20	141	23								
141	25	142	6								
142	10	142	11								
146	10	146	12								
146	15	146	18								